

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

JONATHAN A. BLOOM,

Plaintiff,

V.

Civil Action No. 5:16-cv-121

**SYLVIA BURWELL in her official capacity
As Secretary, United States Department
Of Health and Human Services,**

Defendant.

STIPULATED MOTION FOR EXTENSION OF TIME

Defendant Sylvia Burwell, Secretary of the United States Department of Health and Human Services ("the Secretary"), by her attorney, Eric S. Miller, United States Attorney for the District of Vermont, hereby requests an extension of time to respond to Plaintiff Jonathan A. Bloom's Complaint. In support of this motion, the Secretary submits the following:

1. On May 9, 2016, the United States Attorney's Office for the District of Vermont was served with the Summons and Complaint. The Secretary's answer is currently due on July 11, 2016.
2. The undersigned needs additional time to review the file in this matter and to confer with agency counsel before submitting the Secretary's response.
3. The Secretary requests an additional thirty (30) days from the answer due date of July 11, 2016 within which to file her answer or other response. Thus, the Secretary's response would be due on or before August 10, 2016.
4. Plaintiff's attorney, Craig S. Nolan, Esq., has advised this office that Plaintiff does not oppose the granting of this motion.

WHEREFORE, the Secretary respectfully requests that this motion for extension of time be GRANTED.

Dated at Burlington, in the District of Vermont, this 6th day of July, 2016.

Respectfully submitted,

SYLVIA BURWELL,
Secretary of Health and
Human Service

ERIC S. MILLER
United States Attorney

By: /s/ *Melissa A. D. Ranaldo*
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